

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

LAWANDA J. VALENTINE-WILLIAMS,)	CASE NO. 8:24-cv-165
)	
Plaintiff,)	
)	
v.)	MOTION FOR AN EXTENSION OF
)	TIME TO FILE A RESPONSIVE
CITY OF OMAHA, NEBRASKA, <i>et al.</i> ,)	PLEADING
)	
Defendant.)	

COMES NOW the Defendant City of Omaha, by and through its undersigned counsel of record, and moves the Court pursuant to Fed. R. Civ. P. 6(b)(1) for an Order extending the time for the City to answer or otherwise plead to the Complaint in the above-captioned case.

IN SUPPORT OF THIS MOTION, the City states:

1. The Plaintiff served a Summons and a copy of her Complaint to the Office of the City Clerk on or about May 13, 2024.
2. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), the current deadline for the City to answer or file a responsive pleading is June 3, 2024.
3. In addition to the Memorial Day holiday, the undersigned counsel for the City was travelling internationally May 19, 2024 through May 25, 2024, and had multiple other deadlines during the original 21-day answer or responsive pleading period.
4. The City respectfully request an enlargement of time of thirty (30) days from the original answer date of June 3, 2024 for the City to answer or otherwise plead to the Plaintiff's Complaint. The request is made to permit counsel for the City to investigate the allegations of

the Complaint, and to determine and prepare an adequate and appropriate response. The request is not made for purposes of delay.

FOR THE FOREGOING REASONS, the City respectfully requests that this Court extend the time for the City to answer or otherwise plead to the Plaintiff's Complaint by thirty (30) days from the current answer deadline, making a responsive pleading due from the City on July 3, 2024.

Respectfully submitted this 3rd day of June, 2024.

CITY OF OMAHA, NEBRASKA, Defendant.

By: s/ Ryan J. Wiesen

RYAN J. WIESEN, No. 24810

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Attorney for the Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of June, 2024, the foregoing **MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING** was filed with the Clerk of the Court using the CM/ECF system, which is to send notification of such filing to all attorneys of record registered with CM/ECF system.

s/ Ryan J. Wiesen

Deputy City Attorney